

HAND DELIVERED

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**UTAH DIVISION OF
SOLID & HAZARDOUS WASTE
2009.00323**



**U.S. ARMY DUGWAY PROVING GROUND
DIRECTORATE OF ENVIRONMENTAL PROGRAMS**

**Dugway Resource Conservation and Recovery Act
(RCRA) Permit #UT3750211259
Issued: September 2005**

**RCRA PERMIT
MODIFICATION REQUEST**

January 2009

**Dugway Proving Ground RCRA Operating Permit
Dugway Thermal Treatment Facility (DTTF)
Summary of Modifications
January 2009**

Document	Title	Proposed Changes
Module V	Treatment of Energetic Wastes	<ul style="list-style-type: none"> ▪ General editorial, including deletion of repetitive definition of acronyms (global) ▪ Replaced “emergency coordinator” with “environmental coordinator” (global) ▪ Condition V.F.1: Updated reference for human health risk assessment, which is being submitted concurrently with this permit modification request. ▪ Condition V.F.3.d: Removed the specific operating limits and inserted a reference to the Dugway Title V Operating Permit. Currently, the per event and 12-month rolling operating limits are as follows: <ul style="list-style-type: none"> ○ Net explosive weight (NEW) shall be no greater than 1,000 lbs per event for open burn (Condition II.B.14.a), ○ NEW shall be no greater than 30,000 lbs per rolling 12 month period for open burn (Condition II.B.14.c), ○ NEW shall be no greater than 1,500 lbs per event for open detonation (Condition II.B.15.a), and ○ NEW shall be no greater than 30,000 lbs per rolling 12 month period for open detonation (Condition II.B.15.c). <p>The rationale for this change is to limit the number of documents in which the operating limits are specified, so that there are fewer documents that would require modification in the event that a change to the limits were to occur and to prevent any confusion as to what the operating limits are. (Currently, the limits are contained in the Title V Operating permit, Module V, and the Standing Operating Procedure (SOP) for the Dugway Thermal Treatment Facility (DTTF): DG-0000-H-100.) The operating limits specified in the Title V permit are consistent with the human health risk assessment being submitted concurrently with this modification request. In addition, any changes to the air permit would require risk assessments to ensure the limits are protective of human health and the environment.</p> ▪ Condition V.H.1.f: The term “forecast” was inserted to clarify when the meteorological conditions are actually collected and recorded. Per SOP DG-0000-

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		<p>H-100, DTF operators must confirm that meteorological conditions are met prior to commencing an open burn or open detonation. If more than one burn or detonation is to occur in a day, general meteorological conditions may be recorded once.</p> <ul style="list-style-type: none"> Condition V.H.2: The reference to the SOP was updated to refer to the DTF SOP. Condition V.W.1.f: The term "forecast" was inserted to clarify when the meteorological conditions are actually collected and recorded. Per SOP DG-0000-H-100, DTF operators must confirm that meteorological conditions are met prior to commencing an open burn or open detonation. Condition V.Y.2. Deleted this condition that indicated, "Within 180 days of permit issuance, the Permittee shall submit a report addressing the need for investigations of releases of hazardous waste or hazardous waste constituents as required by R315-8-6.12 and in accordance with Module IV." As discussed with DSHW personnel, this condition appeared to be tied to a nature and extent investigation, which has already been conducted. In addition, future compliance sampling is required as outlined in Attachment 3-9.
Attachment 3-1	DTTF Waste Analysis Plan	<ul style="list-style-type: none"> Section 4.2: The reference date for the human health risk assessment was modified to reflect the risk assessment submission in November of 2008 Section 5.0: The Reference for the DTF SOP was corrected.
Attachment 3-3	DTTF Inspection Schedule	<ul style="list-style-type: none"> Section 2.0: Modified text indicating that inspection records have been changed to include per day and per event activities. Global format modifications of forms to list acronyms. Form 1, Record Inspection, Bullet 2: Modified text to indicate form T004 is the destruct order. Form 1, Record Inspection, Bullet 3: Added text indicating that inspection records have been changed to include per day/event. Form 1, Site Inspections, Bullet 1: Modified text to indicate "after event" inspections has been completed if OB & OD events have taken place within the month. Form 2: Modified title of form to Daily Open Burn Activities. Form 2: Modified form to include per day and per event activities.

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		<ul style="list-style-type: none"> ▪ Form 2, Before Each Day for OB Events, Environmental Data, Bullet 3: Modified text to indicate form T004 is the destruct order/certificate. ▪ Form 2: Added section “Before Each OB Event”. ▪ Form 2: Modified text to indicate “After Each Day with OB events”. ▪ Form 3: Modified title of form to Daily Open Detonation Activities. ▪ Form 3: Modified form to include per day and per event activities. ▪ Form 3: Before Each Day for OD Events, Environmental Data, Bullet 3: Modified text to indicate form T004 is the destruct order/certificate. ▪ Form 3: Added section “Before Each OD Event”. ▪ Form 3: Modified text to indicate “After Each Day with OD events”. ▪ Form 4, DTF Site Manager, Bullet 2: Modified text to indicate form T004 is the destruct order ▪ Form 4, Inspection Forms, Bullet 1: Modified text to indicate “after event” inspections has been completed if OB & OD events have taken place within the month.
Attachment 3-4	Training	<ul style="list-style-type: none"> ▪ Section 2.1: removed fifth bullet concerning emergency response personnel. This is consistent with the approved modification to Attachment 2-4 in February 2008.
Attachment 3-5	DTTF Facility Description	<ul style="list-style-type: none"> ▪ Corrected numeric notation to show numbers less than ten spelled out (global). ▪ Section 2.4: Modified text to indicate actual number of 90-day sites. ▪ Section 5.0: Corrected the references to Utah Administrative Code Rule 315-4-11 to include subsection “c” in the reference. ▪ Figure 4: Revision to Figure 4 showing the actual number and location of 90-day sites.